Response to EPA comments

Order Page 5:

- Yes, 0.0017 is a typo. The mass and concentration limits have been corrected.
- Scattergood limit of 0.436 mg/L for TRC was carried over from their prior order. The prior order for this site did not have that limit.

Order Page 6:

- I don't think we need to add that statement. This limit applies to the metal cleaning wastes prior to commingling with OTC water so it would not change if there were no OTC water.

Order Page 16:

- Good point. I have deleted the highlighted text. Please remove sentence from page E-27 also.

Order Page 17:

- I don't have this language in my template. Where would it be added? In the Scattergood permit, it appears under the "other special provisions, letter (a).

Page A-3:

- I have not typically included a definition of low volume wastes here because it is so specific to the facility (as defined in the fact sheet). If we did add it we would probably need to add metal cleaning wastes as well. See below for definitions or please include a citation to these definitions.

  Per 40 CFR 423.11(b):
  The term *low volume waste sources* means, taken collectively as if from one source, wastewater from all sources except those for which specific limitations are otherwise established in this part. Low volume wastes sources include, but are not limited to: wastewaters from wet scrubber air pollution control systems, ion exchange water treatment system, water treatment evaporator blowdown, laboratory and sampling streams, boiler blowdown, floor drains, cooling tower basin cleaning wastes, and recirculating house service water systems. Sanitary and air conditioning wastes are not included.

  For metal cleaning waste, 40 CFR 423.11(d):
  The term *metal cleaning waste* means any wastewater resulting from cleaning [with or without chemical cleaning compounds] any metal process equipment including, but not limited to, boiler tube cleaning, boiler fireside cleaning, and air preheater cleaning.

Page E-8:

- PCBs and DDT are included in the referenced Table 1 of the Ocean Plan. Unless we want to require a different frequency for these constituents I think we are okay.

Page F-48:

- There was no chromium III limit in the prior permit. Please update the sentence on page F-29 then, which states that:

  "Based on the evaluation using the *RPcalc 2.2* software tool the discharge does not demonstrate reasonable potential for arsenic, copper, zinc, and chromium (III) (Endpoint 2). The prior order included effluent limitations for these pollutants. Thus, as specified in the Ocean Plan, effluent limitations for these pollutants have not been retained in this Order."

Page F-55:

- No, the mixing zone study is for the Ocean discharge. Due to reclassification of the receiving water dilution credits are no longer granted for the Harbor discharge.

  Please update the effluent tables where dilution is implied. For example, see table F-2, where footnote 1 is after discharge point 002. Please remove.

  It also might be helpful to add a sentence under section b. Min Initial Dilution, on page X, stating that no dilution is allowed for discharge point 002. (I know this is discussed in section b, assimilative capacity and dilution credit, on page X, so a cross reference would also work).

  Also, section 6.(c) calculations for discharge point 002 implies that the discharger can do a mizing zone study. Please edit the following sentence "However, in accordance with the reopener provision in Section VI.C.1.e, this Order may be reopened upon the submission by the Discharger of adequate information to establish appropriate dilution credits or a mixing zone, as determined by the Regional Water Board." Page F-41. There may be other places as these are examples that lead to my confusion.

ZINC:

Zinc has a TBEL per 40 CFR 423.13 (BAT), except as provided by 40 CFR 125.30 to 125.32. Specifically, 40 CFR 423.13A(d)(1) says that zinc cannot exceed 1.0 mg/L daily max and 1.0 mg/L average monthly for cooling tower blowdown. I am checking into how this would apply to discharge point 001 to the ocean. (This is not applicable to discharge point 2 since the limit is based on water quality).